

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

GERALD A. GRECA,

Plaintiff,

Case No.

-vs-

HON.

**METROPOLITAN LIFE
INSURANCE COMPANY,**
a New York corporation,

Defendant.

CHARLES W. PALMER (P29271)
Attorney for Plaintiff
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Wyandotte, MI 48192
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COMPLAINT

Plaintiff, Gerald A. Greca, by and through his attorney, Charles W. Palmer, P.C., says as follows:

1. Plaintiff is a resident of the City of Carleton, Wayne County, Michigan.
2. Defendant Metropolitan Life Insurance Company is a New York corporation, which is doing business in Wayne County, Michigan.
3. This court has jurisdiction pursuant to ERISA, 29 U.S.C. § 1132(e) and 28 U.S.C. § 1131.
4. Venue in this Court is appropriate because the actions complained of herein occurred in the Eastern District of Michigan, Southern Division.
5. Plaintiff was the beneficiary of a long-term disability contract with defendant Metropolitan Life Insurance Company through his employer, Federal-Mogul Corporation.

6. Defendant has denied plaintiff's appeal of its decision denying continuing long-term disability benefits for plaintiff after December 15, 2015.

7. Plaintiff has exhausted all administrative remedies prior to bringing this action.

8. Plaintiff's claim seeks to recover benefits, enforce rights, including clarified right to future benefits under 29 U.S.C. §1132(a)(i)(B).

9. Defendant's denial of plaintiff's long-term disability benefits is arbitrary and capricious and not supported by substantial evidence.

WHEREFORE, plaintiff requests this Honorable Court enter judgment for plaintiff against defendant for damages, including past, present and future long-term disability benefits and attorney's fees pursuant to 29 U.S.C. §1132, and any other relief this Court deems equitable, just and proper.

Dated: March 10, 2016

Respectfully submitted,

s/ Charles W. Palmer

CHARLES W. PALMER (P29271)
Attorney for Plaintiff

CERTIFICATION OF SERVICE

I hereby certify that on March 10, 2016, I electronically filed the foregoing Complaint with the Clerk of the Court using the ECF system.

s/ Charles W. Palmer

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